5.1.2-3

Project Scoping Meeting
Simplot Plant Area Remedial Design
Eastern Michaud Flats Superfund Site

August 6, 2002

Summary

The Remedial Design/Remedial Action Consent Decree for the Simplot Plant Area portion of the Site was finalized on May 9, 2002.

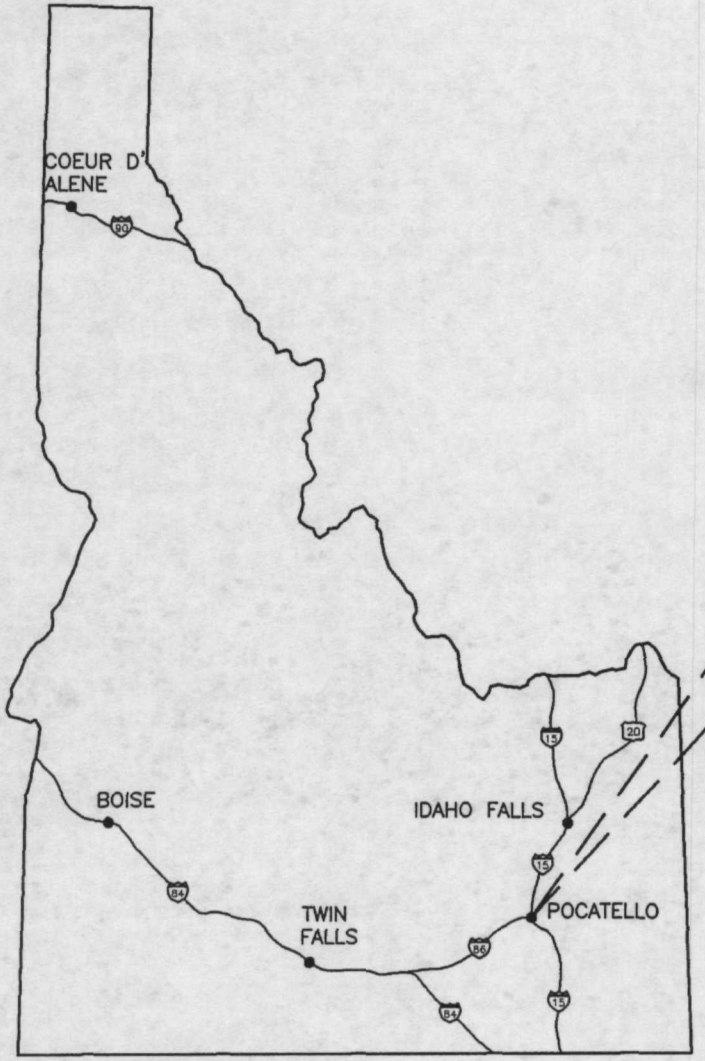
The Consent Decree Statement of Work (SOW) addressed the following work elements for remediation:

- Groundwater Extraction
- Dewatering Pit
- Gypsum Stack Roads
- Former East Overflow Pond
- Groundwater Monitoring
- Simplot Plant Area Institutional Controls

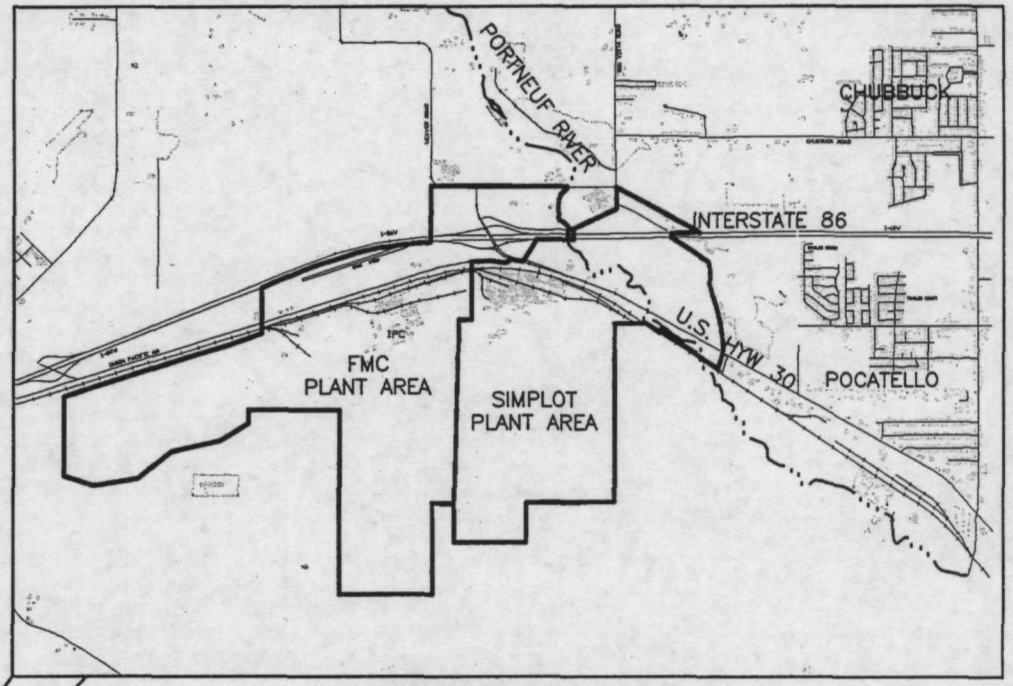
Remedial design and construction completion reports have been submitted (delivery date was August 5, 2002).

The following pages provide a summary of each element of work.

4/02 BY: RHF



IDAHO



EASTERN MICHAUD FLATS
SUPERFUND SITE VICINITY

SIMPLOT PLANT AREA
EASTERN MICHAUD FLATS
SUPERFUND SITE
POCATELLO, IDAHO

GROUNDWATER EXTRACTION REMEDIAL DESIGN REPORT

FIGURE 1

SITE LOCATION MAP

PROJECT: 010121.1	DATE: JULY 2002	
REV:	BY: RHF	CHECKED: AC

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Images: [none]
Plot time: 1:41 pm
Plot date: 5/22/02

Subject _____ Project No. _____

By _____ Checked By _____ Task No. _____

File No. _____

Date _____ Date _____ Sheet _____ of _____

PROJECT SCOPING MEETING
AUGUST 6, 2002

SIGN-IN SHEET

NAME	ORGANIZATION	PHONE
LEON PRUETT	JRS - Don Plant	(208) 234-5370
Ward Wolfesen	Simplot Corp.	(208) 389 7558
Doug Frick	MFG	425-921-4000
Andy Koulermos	MFG	303 447 - 1823
DAN PASTOR	MFG	"
Dale Reavis	JRS	(208) 234-5476
Roger Turner	Sho-BAN	208 478-3905
Sue SKinner	EPA - Pocatello	(208) 478-1680
Linda MEYER	EPA	(206) 553-6636
Joe Baldwin	DEQ - Boise	(208) 373-0248
Ed Greutert	EPA Contractor	(206) 386-4793
Rick Kuhlthau	ASE/EPA Contractor	(703) 876-6287
Lynn Van Every	DEQ - Pocatello	(208) 236-6160
Doug Tanner	DEQ - Pocatello	(208) 236-6160

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Calciner pond constituents – selenium/chloride > Simplot

decrease

rates of seepage out bottom of stack probably have not substantially since concentrations are still same.

cone of depression due to pumping - ROI/RA document /.

Production wells capture the majority of gypstack plume - no quality data from production well / flow gradient between west boundary to well 403 = low gradient.

1996 - installed 3 extraction test wells. 345/343 337/338 deep upper 24 hour pump test

343 has been pumping 60 to 70 gpm last 4 years.

In 1997 field report.

Large radius of influence.

problem w/scaling - pilot test.

---

why no wells in upper zone.

(upper zone 10' thick.

not feasible – not much flow in this zone

Subject _____ Project No. _____

By _____ Checked By _____ Task No. _____

File No. _____

Date _____ Date _____ Sheet _____ of _____

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Doug Tanner	DEQ - Pocatello	(208) 236-6160

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Groundwater Extraction System Design

- Groundwater modeling was performed during the Feasibility Study (FS) to identify candidate extraction areas.

- The modeling effort indicated nearly all of the stack-affected groundwater could be intercepted by placing extraction wells in the western relect channel (Location "A"), on the eastern side upper zone near the toe of the lower gypsum stack (Location "B") and in the eastern side lower zone (Location "C") (see figure)

- Field studies and pilot tests were then performed to further evaluate the candidate extraction areas and see if the identified pumping scenarios would hold true under active pumping.

- Based on pumping results, the following well spacings and pumping rates were indicated for optimal groundwater capture:

  West Plant Area
  - Two wells within the relect channel pumping at a combined rate of 150 gpm.

  East Plant Area
  - For the upper zone, seven wells along the toe of the lower stack spaced 130 feet apart pumping at a combined rate of 280 gpm.
  - For the lower zone, two wells northwest of the upper zone wells spaced 400 feet apart pumping at a combined rate of 400 gpm.

ammonia production < 500-700 gallons from production.

Summary

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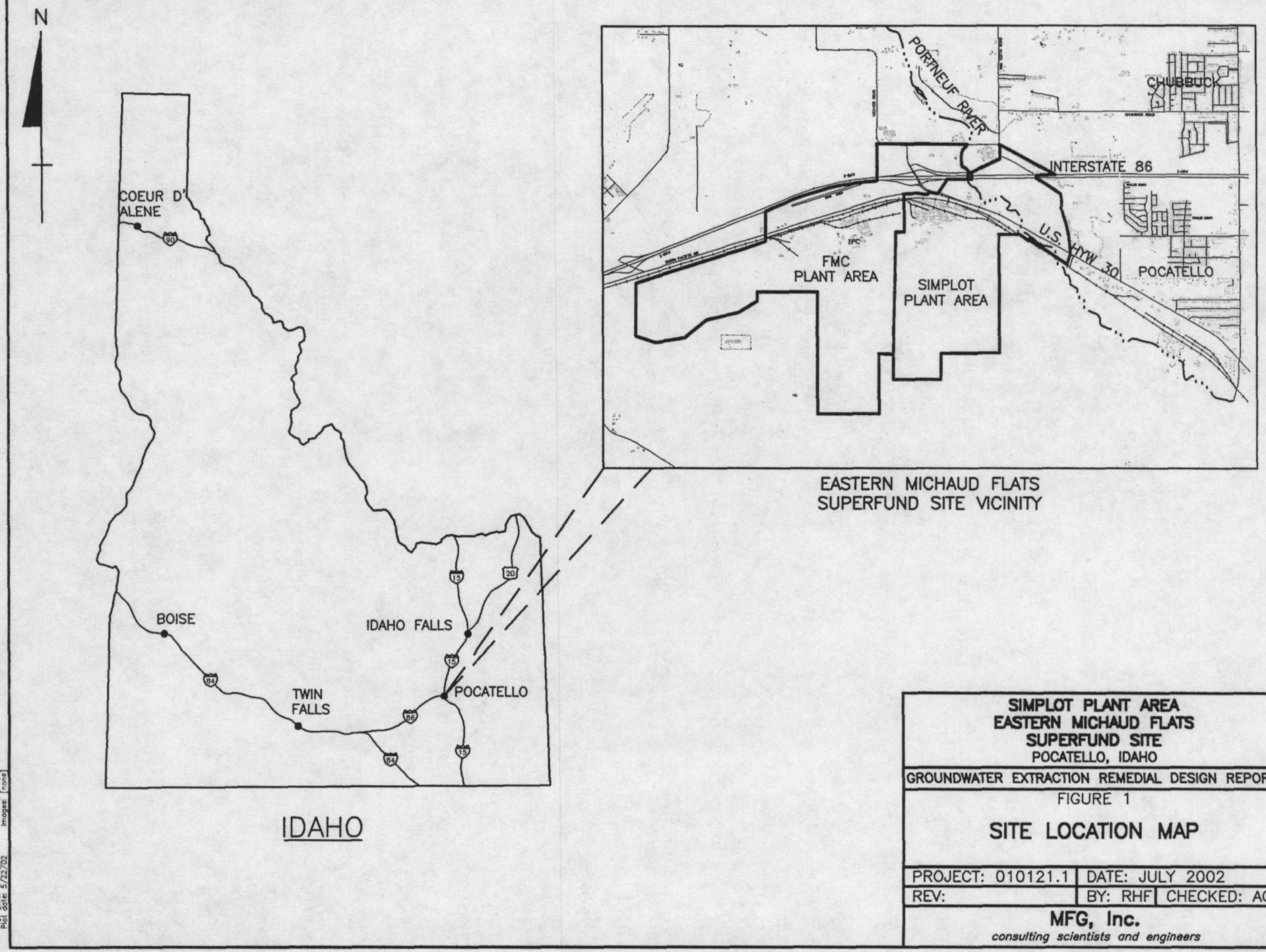
4/02 BY: RHF



SIMPLOT PLANT AREA
EASTERN MICHAUD FLATS
SUPERFUND SITE
POCATELLO, IDAHO

GROUNDWATER EXTRACTION REMEDIAL DESIGN REPORT

FIGURE 1

SITE LOCATION MAP

PROJECT: 010121.1	DATE: JULY 2002	
REV:	BY: RHF	CHECKED: AC

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Plot date: 5/22/02

Groundwater Extraction

Overview of Don Plant Process

- The Don Plant produces phosphoric acid and a variety of liquid and solid fertilizers. Plant production began in 1944 with a single superphosphate fertilizer and has grown to 12 principal products, including five grades of solid fertilizer and four grades of liquid fertilizer.

- Principal raw materials are phosphate ore (transported from the Smoky Canyon Mine by slurry pipeline, since 1991), sulfur and ammonia.

- In the process, the phosphate ore is digested with sulfuric acid to produce phosphoric acid. The phosphoric acid is a product and is also used to generate other fertilizer products.

- The main byproduct of ore digestion is gypsum (calcium phosphate). The gypsum is pumped in slurry form to the gypsum stack.

- A generalized water balance for the plant is as follows (see attached figure):

  Inputs
  - 3 production wells (4,300 gpm)
  - Ore Slurry (220 gpm)
  - Return from gypsum stack (1,200 gpm)

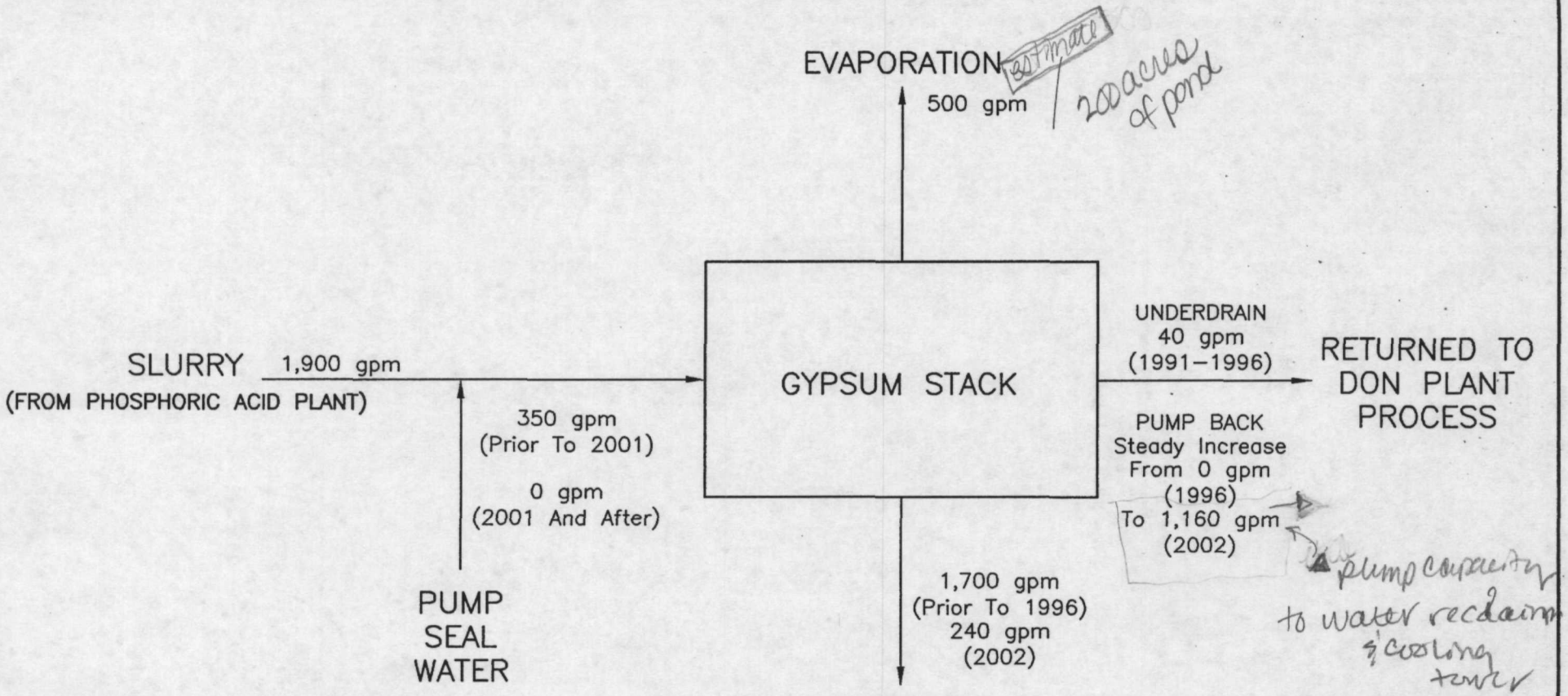
  Outputs
  - Slurry to gypsum stack (1,900 gpm)
  - Irrigation water (800 gpm)
  - Emissions to air
  - Water in products

evapotranspiration rate?
1900 gpm water / ph 2 /
30% solids to gypstack.

OVERVIEW OF GYPSTACK OPERATIONS

- The stack has three separate cells:
    - Lower stack
    - Eastern cell on upper stack
    - Western cell on upper stack
- During the Remedial Investigation (RI) only the upper stack was in use. The lower stack was returned to service around 1994 when Simplot implemented a new, ditch-rimming method of operating the stack.
- Previously slurry was applied to the two upper cells on an annual cycle. With the ditch-rimming method slurry is now applied to each of the cells on a rotating six-week schedule.
- Water sent to the stack is:
    - Collected and returned to the Don Plant
    - Evaporates
    - Seeps to groundwater
- Operational changes have decreased the total seepage to groundwater through
    - Ditch-rimming
    - Process changes due to pipeline ore delivery produce gypsum with lower permeability
    - Changes in way slurry pump seals are operated
- Seepage has reduced such that the area of ponded water has increased from 10-15 acres to about 200 acres.
- Simplot currently has to pump water from the ponded areas back from the Don plant at a rate of 1,160 gpm. Prior to 1996 no water was pumped back.
- Prior to 1996, seepage to groundwater was estimated at 1,700 gpm. Since 1996 seepage has decreased and is currently estimated at around 250 gpm (see figure).

6/02 BY:SCG



NOTE:

1. THE FLOWS SHOWN FOR SLURRY, PUMP SEAL WATER, AND RETURNED TO DON PLANT PROCESS ARE RELATIVELY ACCURATE (BASED ON MEASUREMENTS, PUMP CAPACITIES, ETC). THE FLOWS FOR EVAPORATION AND SEEPAGE ARE ESTIMATES.

SIMPLOT PLANT AREA
EASTERN MICHAUD FLATS
SUPERFUND SITE
POCATELLO, IDAHO

GROUNDWATER EXTRACTION REMEDIAL DESIGN REPORT

FIGURE 4

GYPSUM STACK WATER BALANCE SCHEMATIC

PROJECT: 010121.2	DATE: JUNE 2002	
REV:	BY: SCG	CHECKED: DEP

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Images: [none]
Plot time: 3:07 pm
Plot date: 7/23/02

Site Hydrogeologic Setting

- Site is divided into two hydrogeologic zones (see figures):

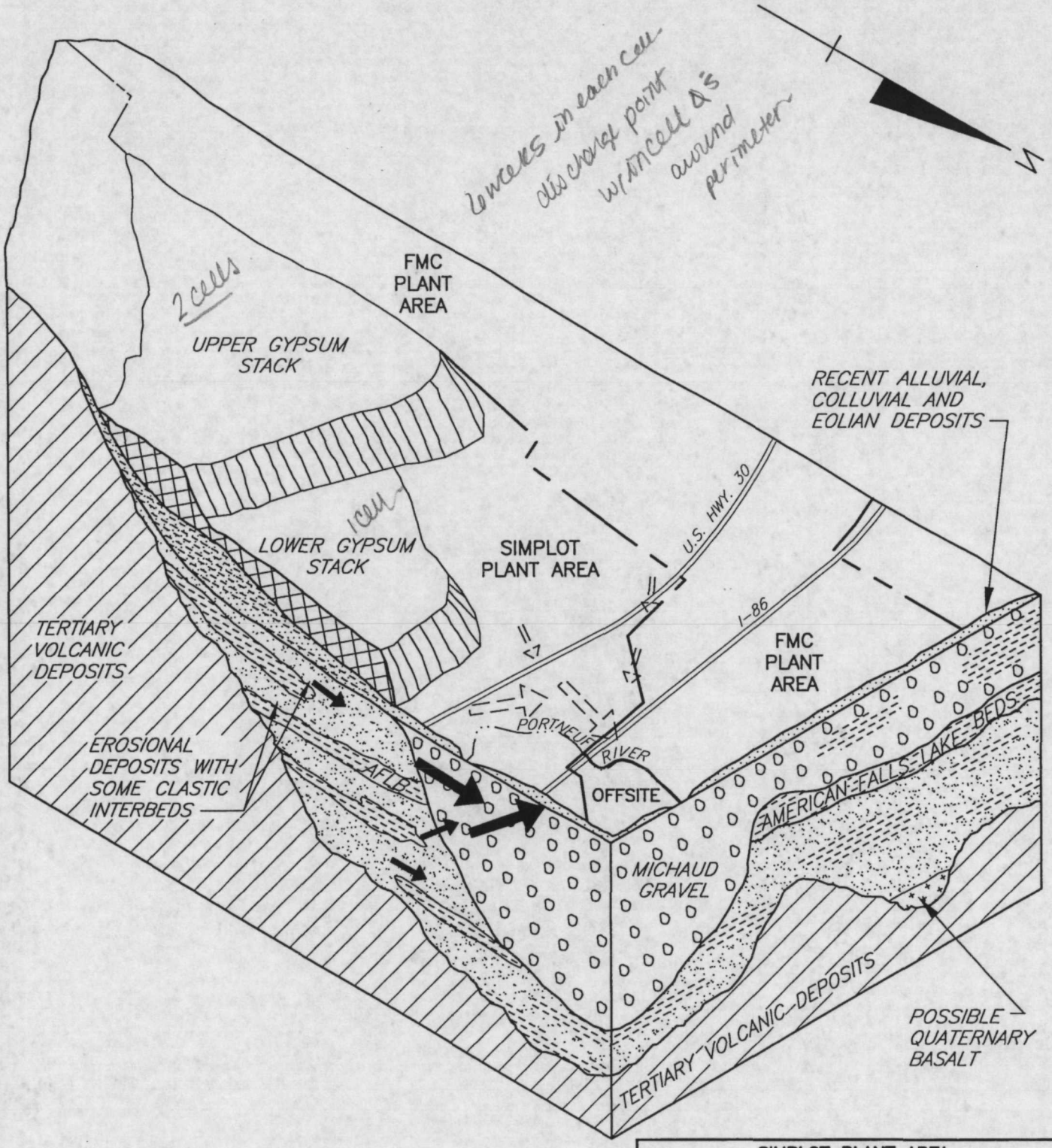
  Bannock Range (beneath Stack)
  - Volcanic bedrock with interbeds of sand and gravel from erosion of bedrock in upgradient areas
  - No distinct aquifer zones, but groundwater occurs in alluvial channels and interbeds
  - A bedrock ridge directs the groundwater toward the east and west
  - West side groundwater follows a buried relect channel filled with alluvial (gravel) material to the west side of the Don Plant
  - East side groundwater is not confined to a drainage channel and covers a wider area flowing to the east side of the Don Plant.

  Michaud Flats (Beneath Don Plant and North)
  - Snake River Plain basalts overlain by volcanic gravel. Above the gravels are fine-grained materials known as American Falls Lake Beds (AFLB).
  - The AFLB serves as a confining layer that separates the Michaud Flats unit beneath the Don Plant into an upper zone and a lower zone.
  - North of the Don Plant the AFLB confining layer is absent and has been replaced by the coarse-grained Michaud Gravels (gravels, cobbles and boulders).
  - Modeling from the RI showed that the plant production wells capture a significant portion of the confined lower zone groundwater.
  - Lower zone groundwater not captured flows up into the upper zone, mixes with shallow groundwater and the larger flux of groundwater from the Michaud Gravels and migrates north to springs along the Portneuf River.

Highest permeability near fenceline - 1.5M
fenceline 200ft/day (308 / well # 343)
lower permeaes 800-900 ft/day
zone
near portenf 200,000 ft/day

Silt - 20' effective confining layer.

5/02 BY: RHF



LEGEND:

GENERAL GROUNDWATER FLOW DIRECTIONS

SIMPLOT PLANT AREA
EASTERN MICHAUD FLATS
SUPERFUND SITE
POCATELLO, IDAHO

GROUNDWATER EXTRACTION REMEDIAL DESIGN REPORT

FIGURE 5

GEOLOGIC BLOCK DIAGRAM

PROJECT: 010121.1	DATE: JULY 2002
REV:	BY: RHF CHECKED: AC

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Distribution of Constituent in Groundwater

An exhaustive investigation of the site environmental conditions was performed during the RI phase of the project from 1992 to 1994. This investigation included quarterly sampling of groundwater from 77 wells, and these samples were typically analyzed for 22 heavy metals, 4 radionuclides and other analytes.

After the RI period, Simplot continued to perform groundwater monitoring in the Simplot Plant Area and at Batiste Spring on a semi-annual basis.

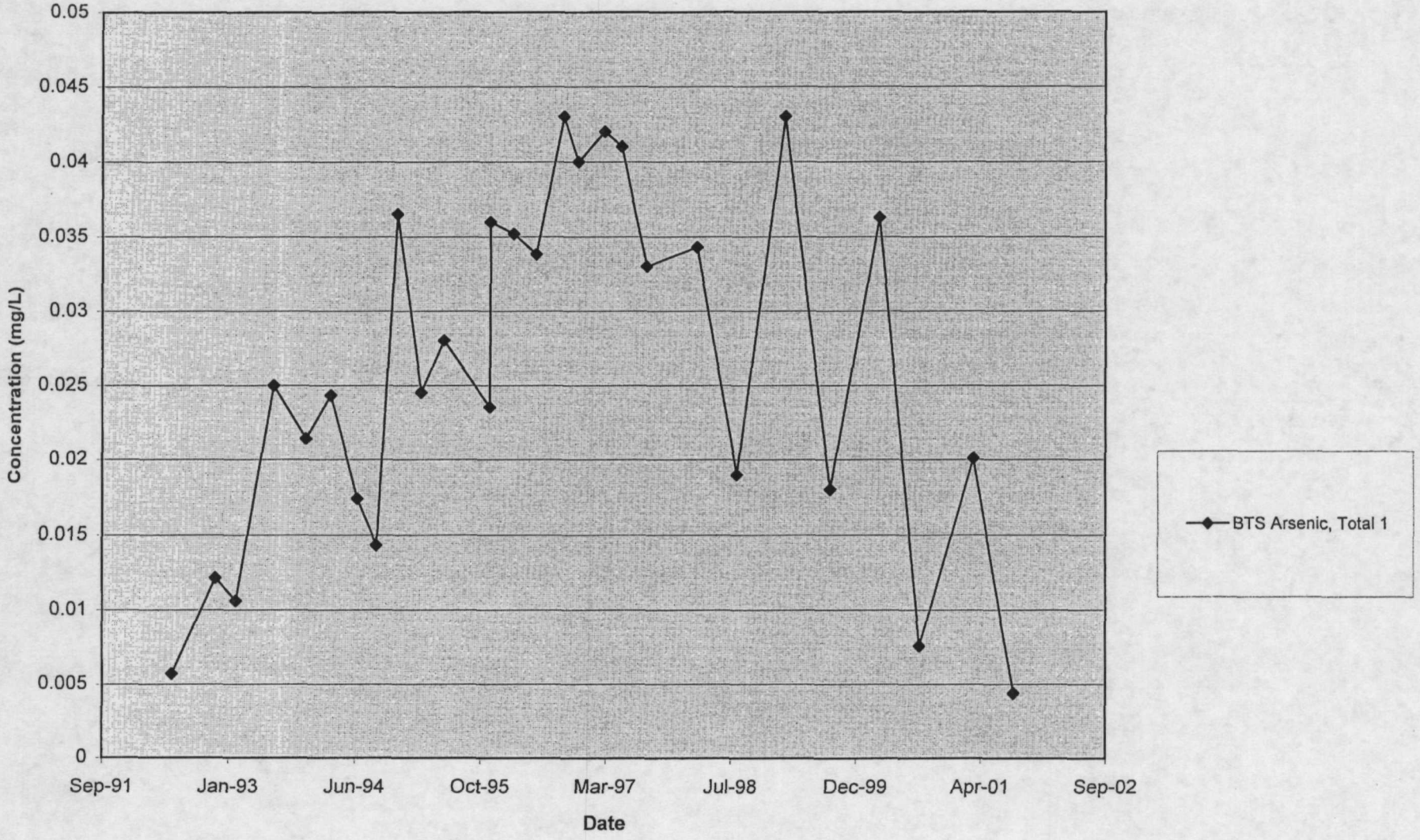
In the Simplot Plant Area, the gypsum stack and the East Overflow pond were identified as sources of constituents to groundwater. The gypsum stack was found to have affected groundwater quality over a relatively large area while the East Overflow Pond (an unlined pond used for collection of process water during plant upsets) had a more localized effect (primarily in the area of paired wells 317 and 318), but resulted in higher constituent concentrations in groundwater. Use of the East Overflow Pond was discontinued in 1993 and the pond was replaced with a new, lined impoundment.

Groundwater from beneath the gypsum stack flows along the east and west sides of a buried volcanic ridge and into the Don Plant Area. Beneath and immediately downgradient of the Don Plant, mixing of upper and lower groundwater with the larger flux of groundwater from the Michaud Gravels reduces the constituent concentrations, prior to discharge to the Portneuf River.

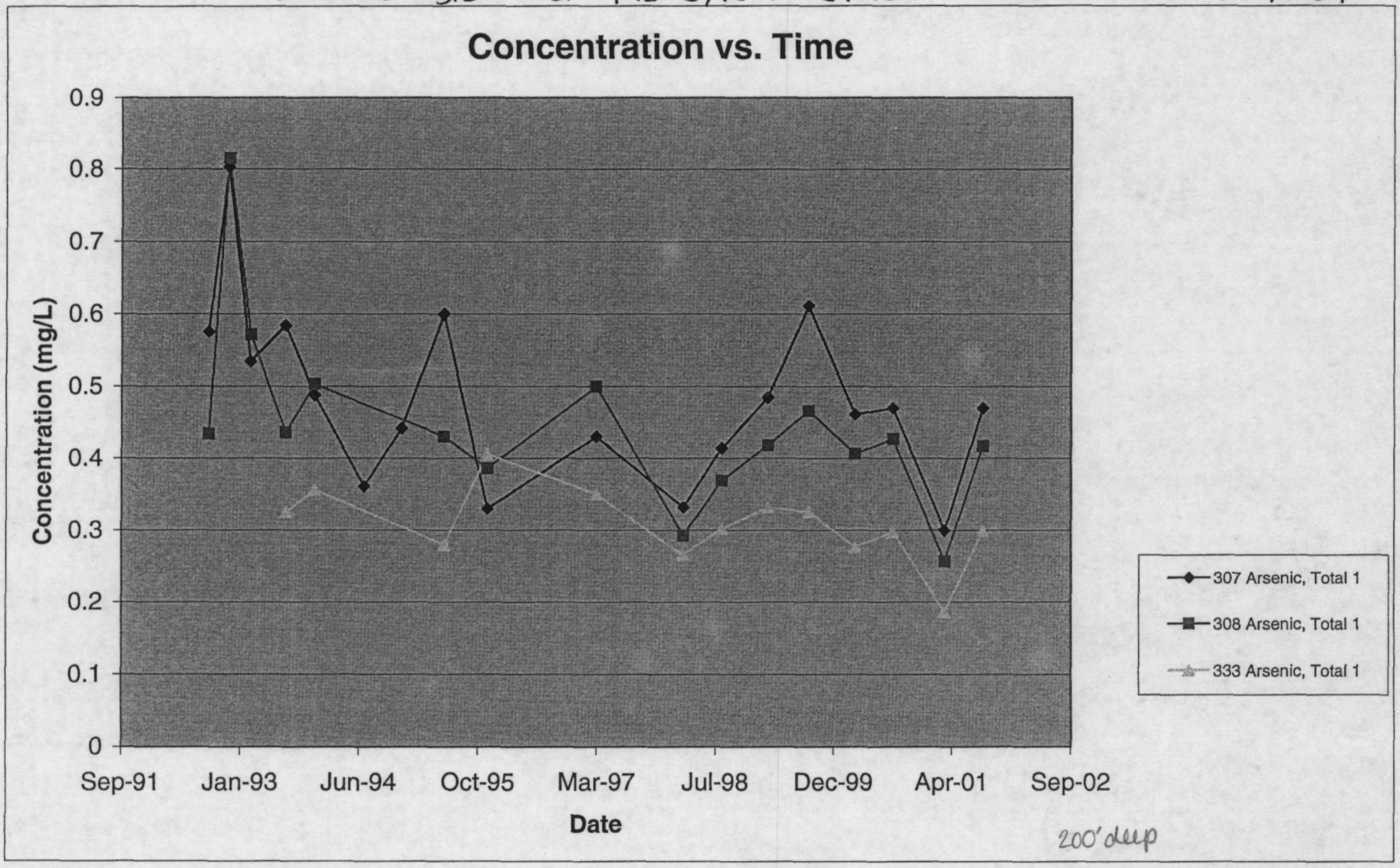
Historically, groundwater discharged at Batiste Spring, to the north of the Simplot Plant Area, has met water quality standards (primarily Maximum Contaminant Levels (MCLs)) for arsenic. However, in February 2002, the arsenic MCL was lowered from 0.05 mg/L to 0.01 mg/L which is approximately equal to the background value of 0.018 mg/L. By comparison, arsenic concentrations at Batiste Spring are typically lower than 0.05 mg/L but greater than 0.01 mg/L.

Overall, groundwater concentrations are similar from 1995 to 2001, with the exception of the area down gradient of the lower stack which was brought back into use in 1994. In the joint fenceline area, data indicate the effect of non-Simplot sources.

Figure 16
Arsenic Concentrations at Batiste Spring

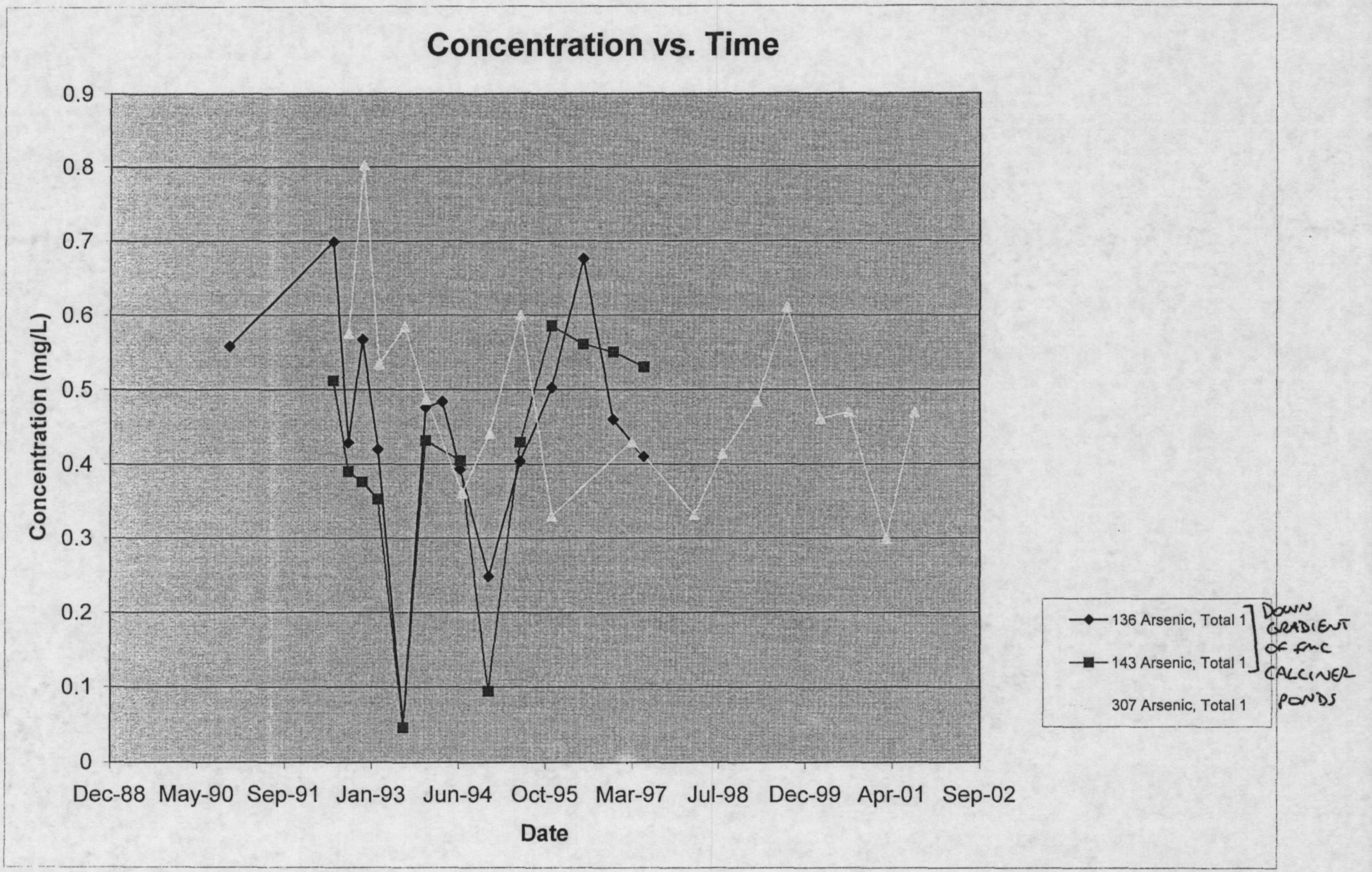


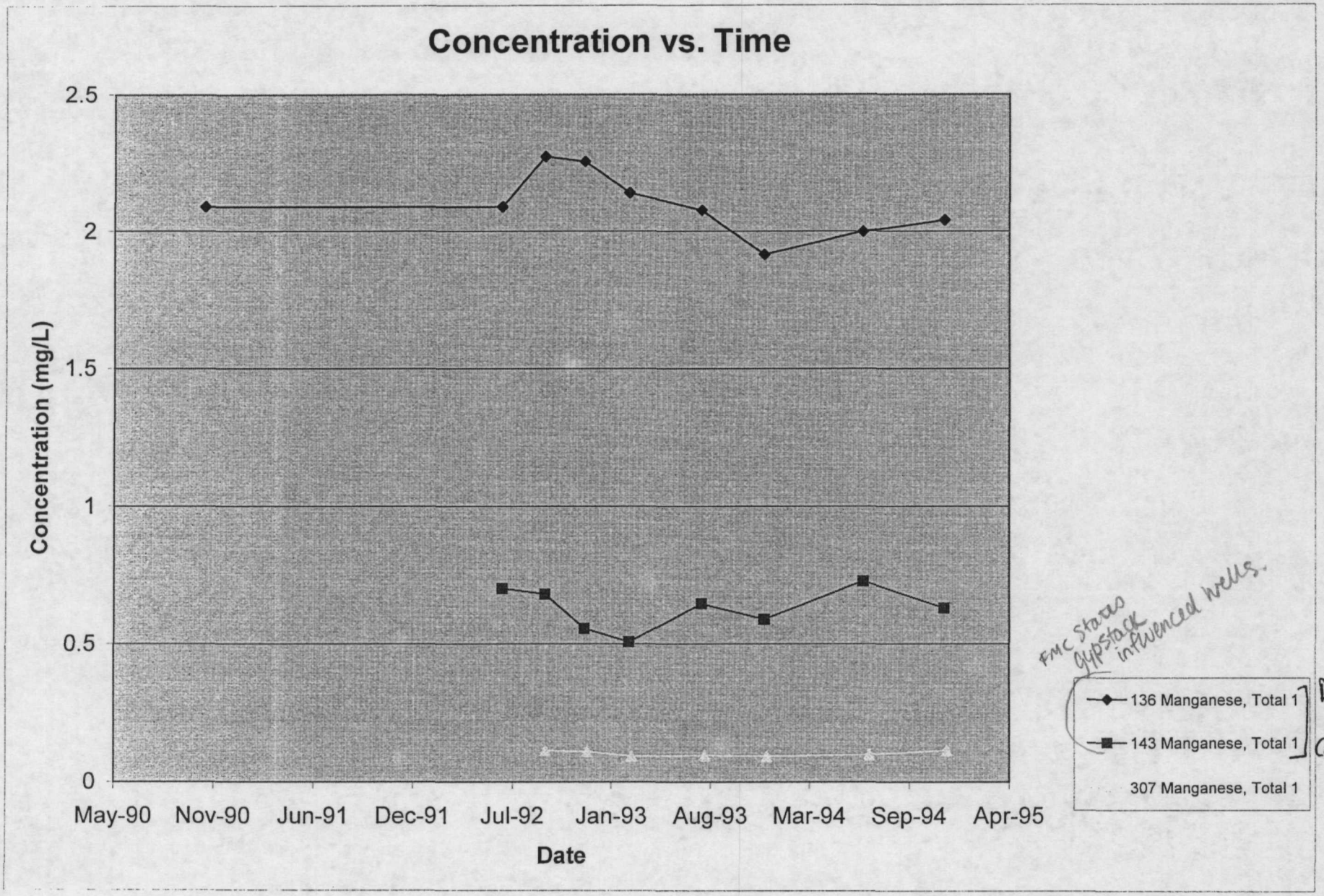
DOWNGRADIENT OF THE GYPSUM STACK - JOINT FENCELINE AREA



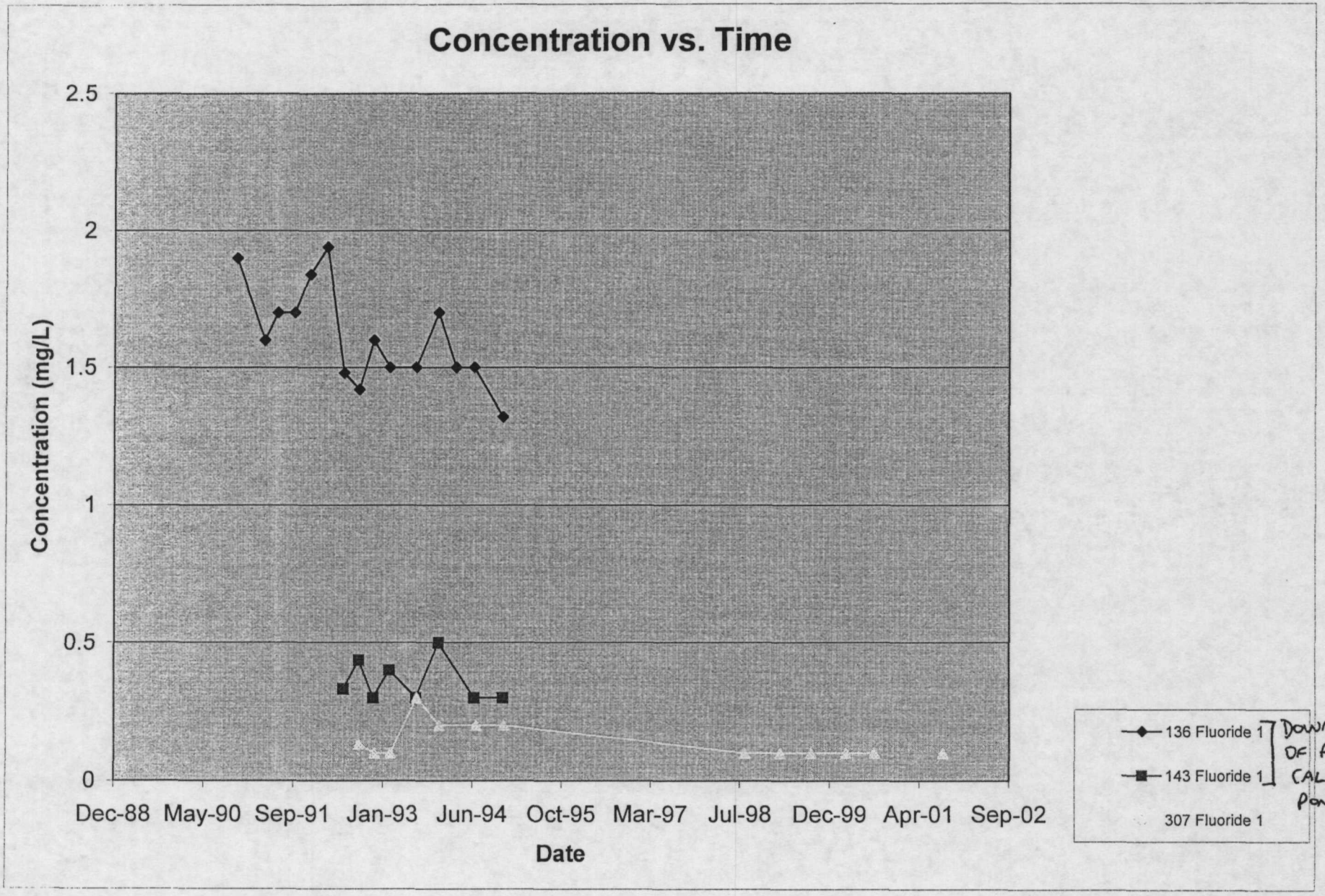
200' deep

first saturated zone -

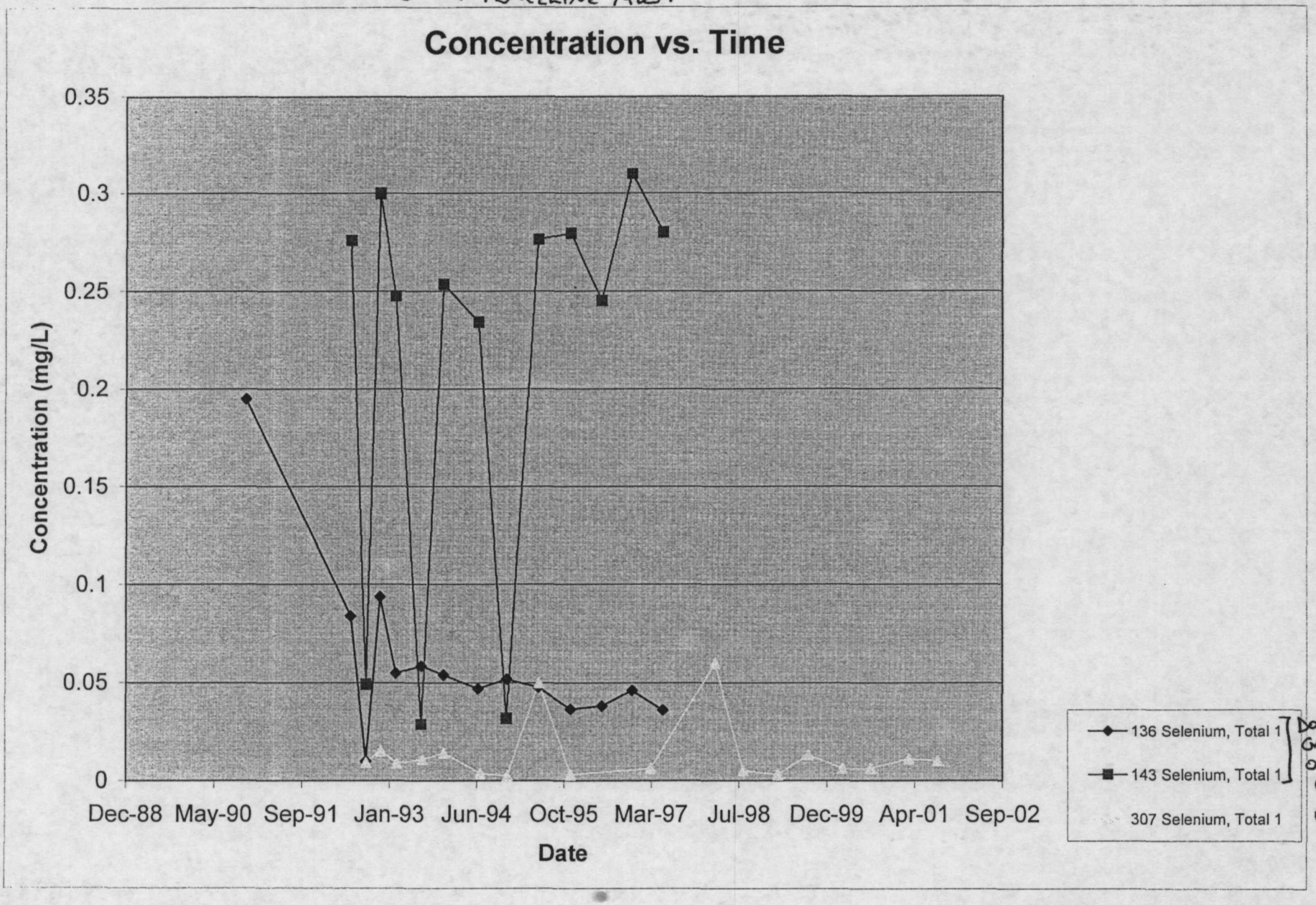

Concentration vs. Time
Concentration (mg/L)
0.9
0.8
0.7
0.6
0.5
0.4
0.3
0.2
0.1
0
Dec-88
May-90
Sep-91
Jan-93
Jun-94
Oct-95
Mar-97
Jul-98
Dec-99
Apr-01
Sep-02
Date
136 Arsenic, Total 1
143 Arsenic, Total 1
307 Arsenic, Total 1
DOWN GRADIENT OF FMC CALCINER PONDS


Concentration vs. Time
Concentration (mg/L)
2.5
2
1.5
1
0.5
0
May-90
Nov-90
Jun-91
Dec-91
Jul-92
Jan-93
Aug-93
Mar-94
Sep-94
Apr-95
Date
136 Manganese, Total 1
143 Manganese, Total 1
307 Manganese, Total 1
FMC stores gypstack influenced wells.
Downgrad of FMC Calcine Ponds

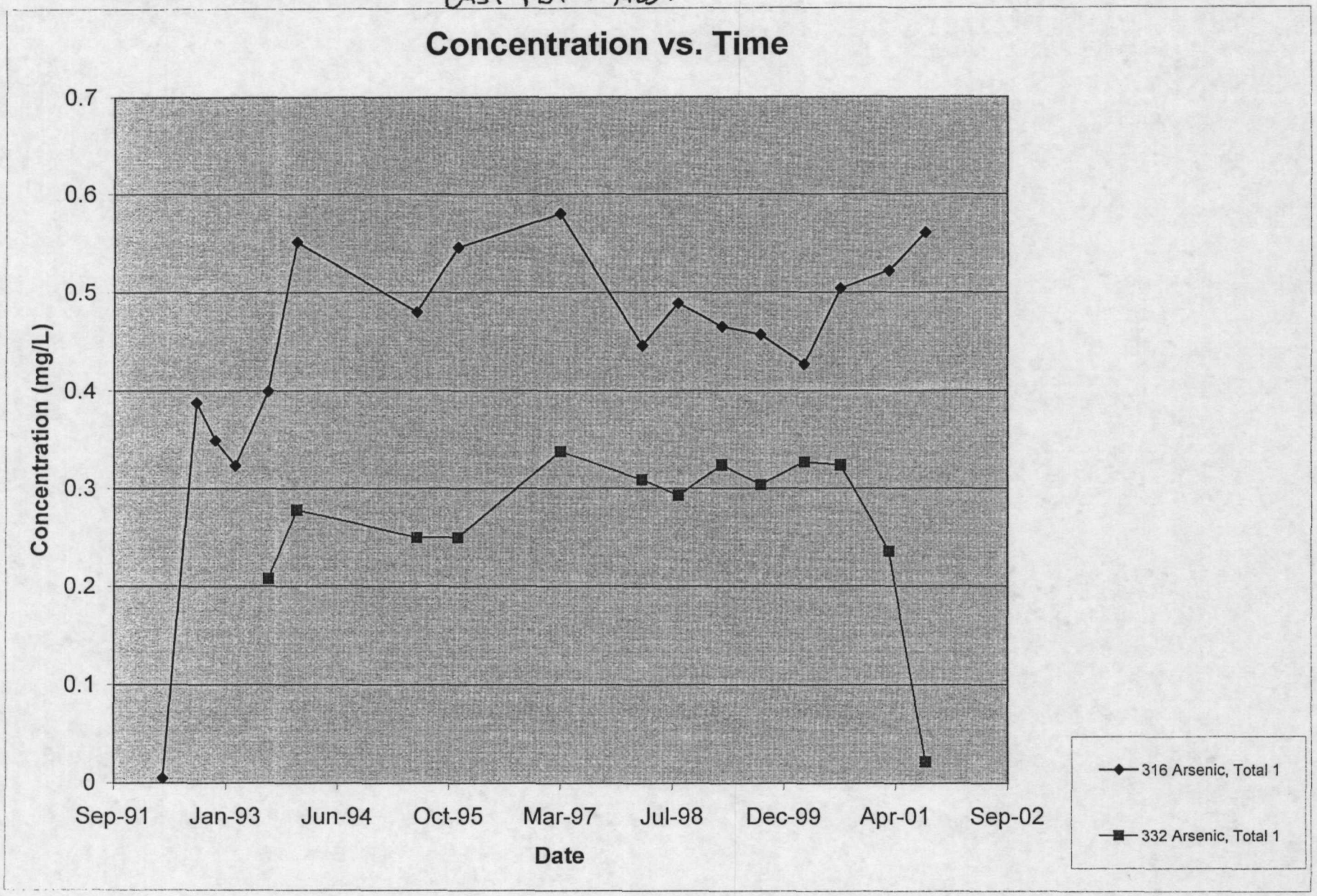
JOINT FENCELINE AREA



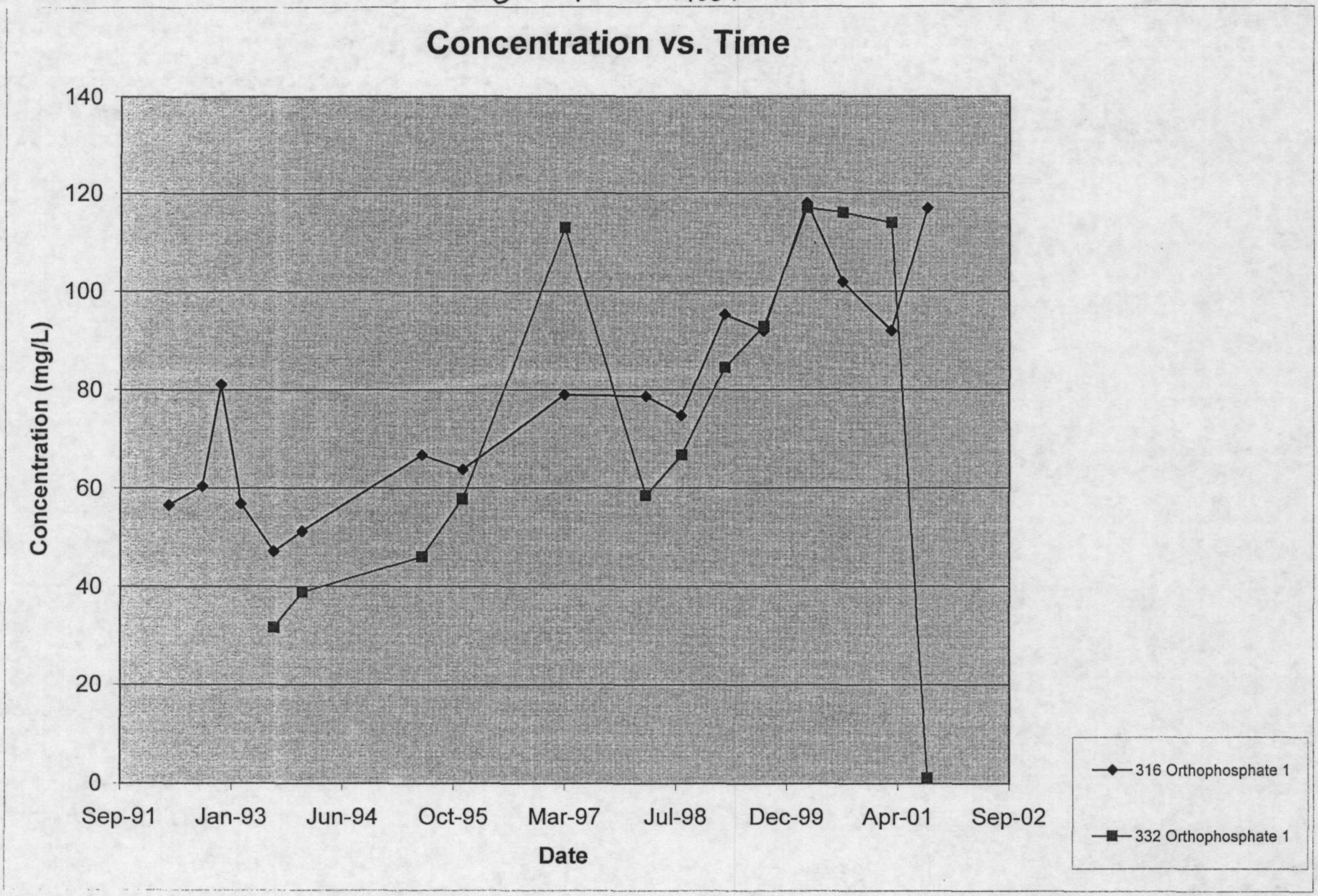
JOINT FENCELINE AREA



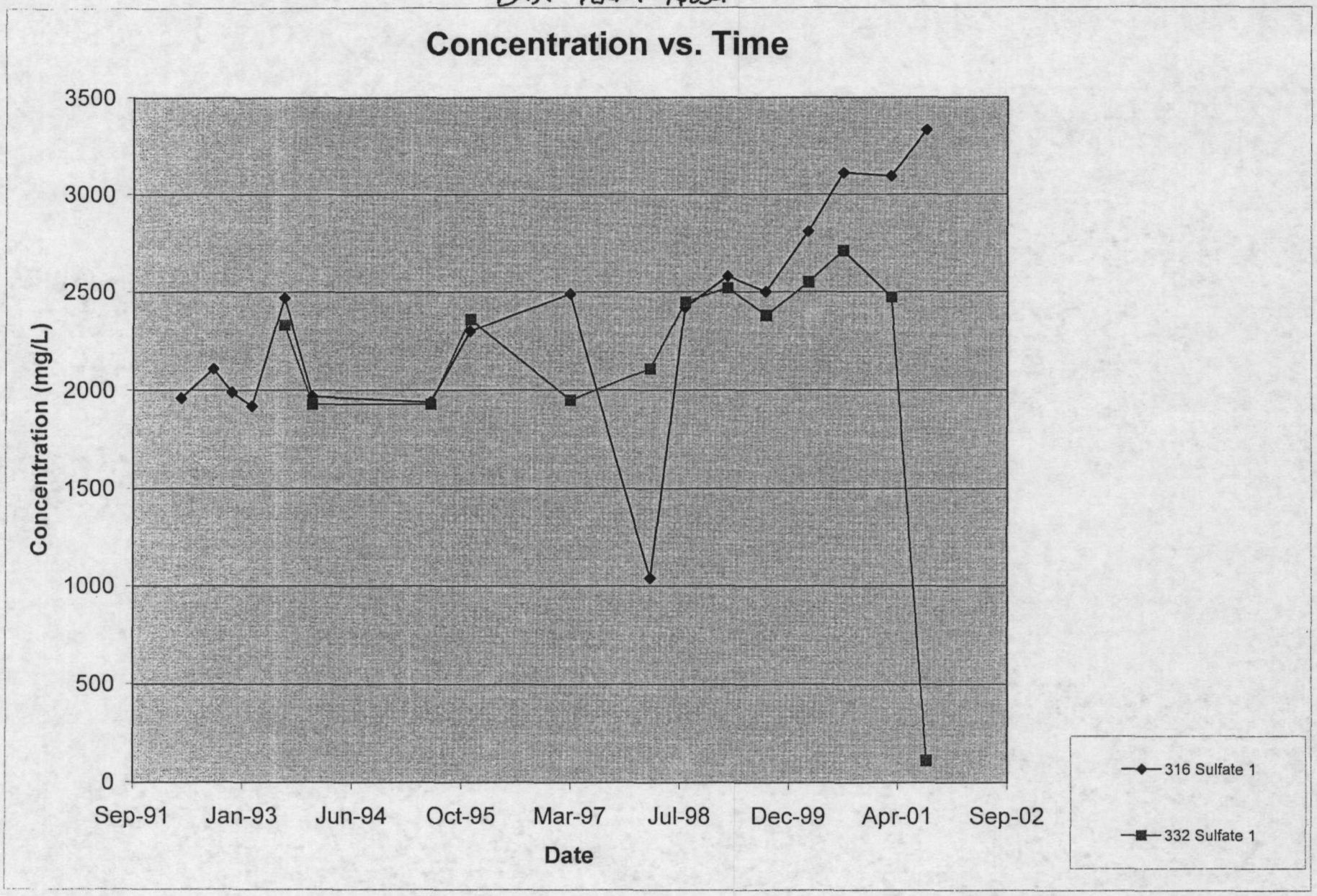
EAST PLANT AREA

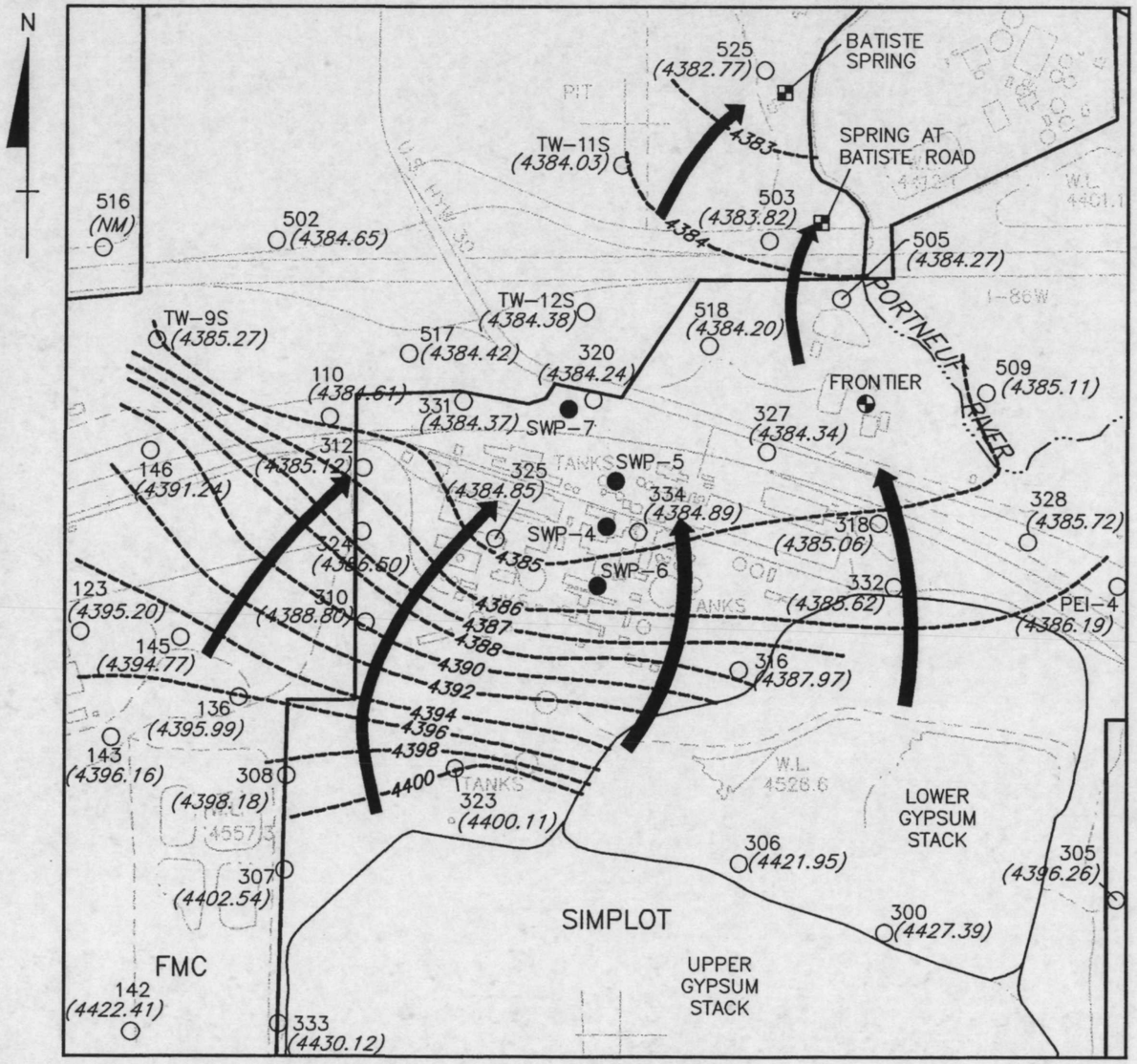


EAST PLANT AREA

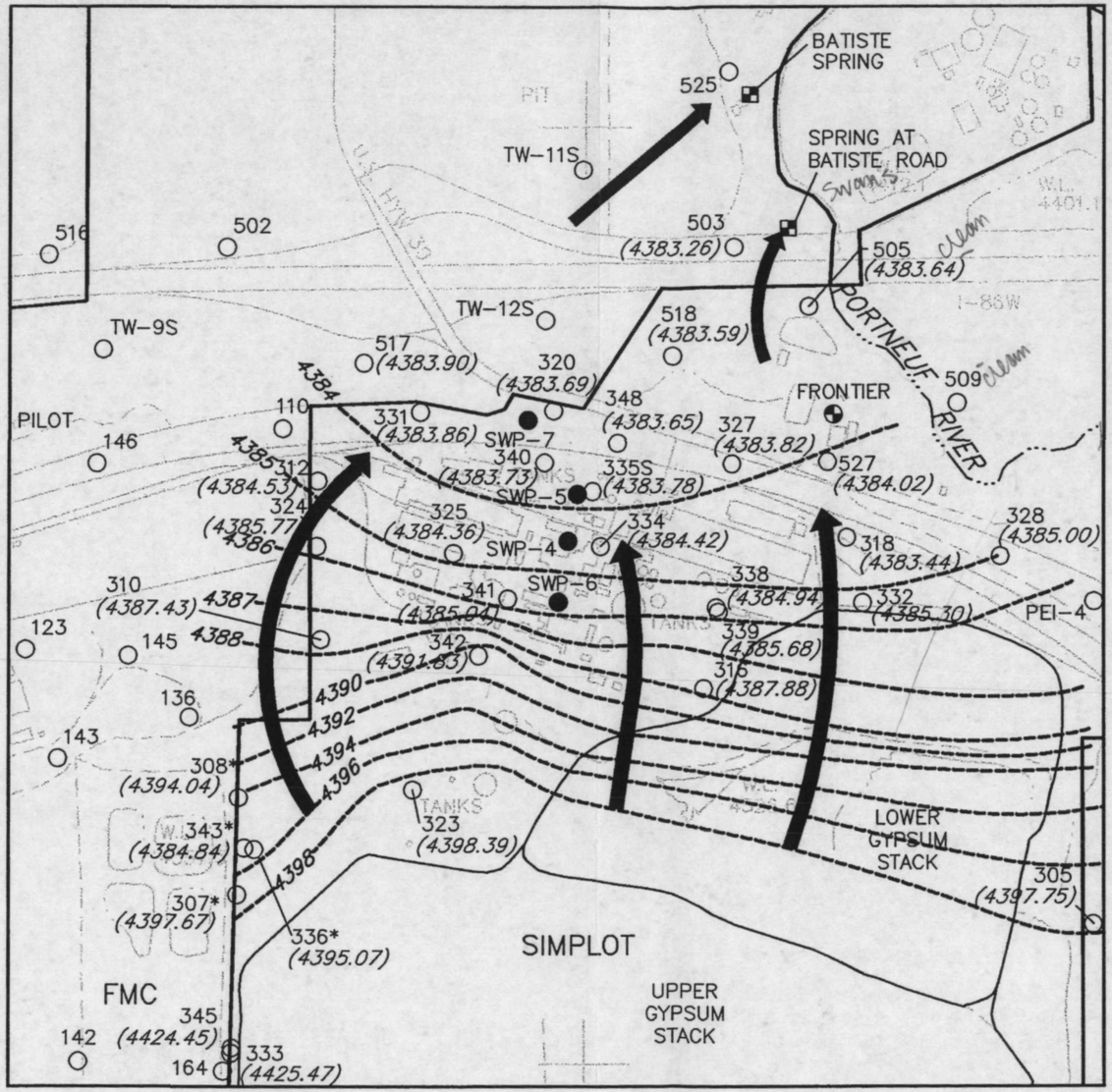


EAST PLANT AREA





UPPER ZONE POTENTIOMETRIC SURFACE 1995



UPPER ZONE POTENTIOMETRIC SURFACE 2001

LEGEND:

346 ○	GROUNDWATER MONITORING WELL LOCATION AND DESIGNATION
(4397.67)	WATER LEVEL ELEVATION MEASURED NOVEMBER 1995 AND AUGUST 2001 (ft MSL)
→	GENERAL DIRECTION OF GROUNDWATER FLOW
4388	LINE OF EQUAL WATER LEVEL ELEVATION (CONTOUR INTERVAL VARIABLE)
FRONTIER ◐	WATER SUPPLY WELL LOCATION AND DESIGNATION
SWP-5 ●	PRODUCTION WELL LOCATION AND DESIGNATION
BATISTE SPRING ■	NATURAL SPRING

NOTE:

*—WATER LEVEL AFFECTED BY PUMPING AT WELL 343.

SCALE
800 0 800 FEET

SIMPLOT PLANT AREA
EASTERN MICHAUD FLATS SUPERFUND SITE
POCATELLO, IDAHO

GROUNDWATER EXTRACTION REMEDIAL DESIGN REPORT

FIGURE 7
UPPER ZONE POTENTIOMETRIC SURFACE AND GROUNDWATER FLOW DIRECTION MAPS (1995/2001)

PROJECT: 010121.2	DATE: MAY 2002
REV:	BY: SCG CHECKED: DEP

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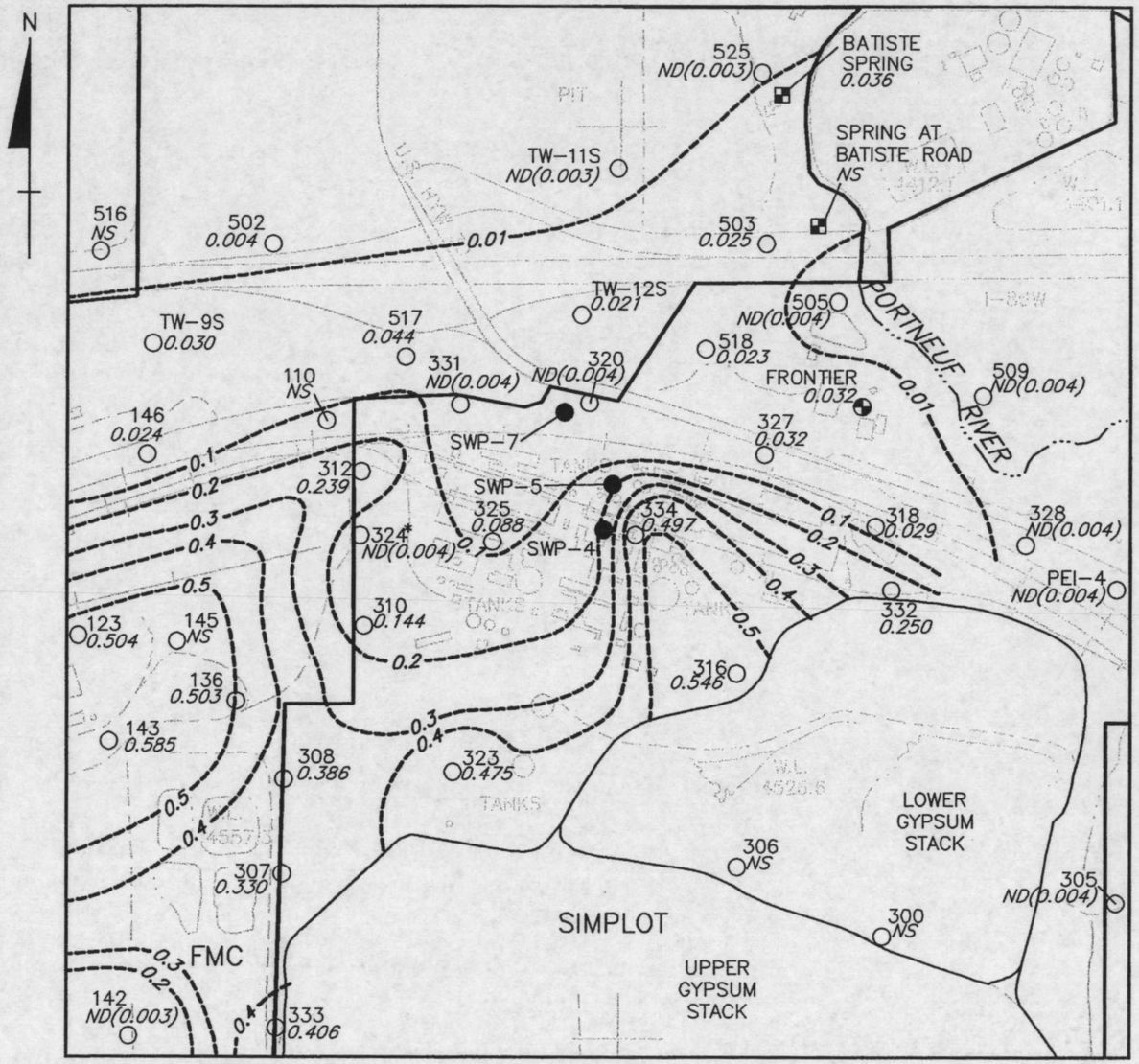
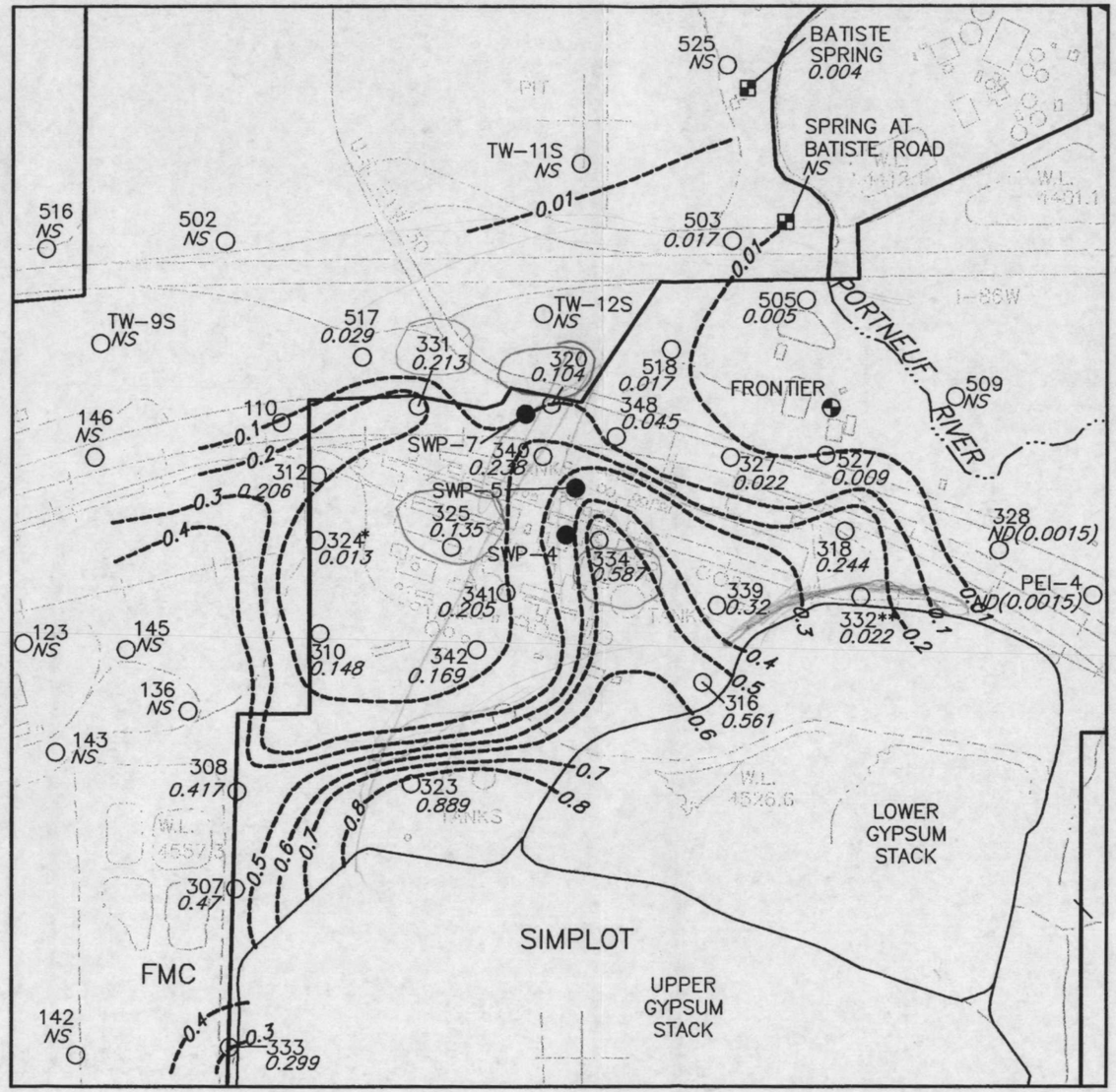


ARSENIC ISOCONCENTRATION LINES 1995



ARSENIC ISOCONCENTRATION LINES 2001

LEGEND:

346 ○	GROUNDWATER MONITORING WELL LOCATION AND DESIGNATION
0.497	CONCENTRATION IN Mg/L
ND(0.040)	ANALYTE NOT DETECTED AT A CONCENTRATION ABOVE THE VALUE INDICATED IN THE PARENTHESIS
0.2 ----	ISOCONCENTRATION LINE (CONTOUR INTERVAL VARIABLE)
FRONTIER ⊕	WATER SUPPLY WELL LOCATION AND DESIGNATION
SWP-5 ●	PRODUCTION WELL LOCATION AND DESIGNATION
BATISTE SPRING ■	NATURAL SPRING

NOTE:

*—WELL 324 NOT CONSIDERED IN DEVELOPING CONTOURS AS THIS WELL'S SCREEN EXTENDS INTO THE LOWER ZONE.

**—UNUSUALLY LOW CONCENTRATIONS WERE REPORTED FOR WELL 332 IN AUGUST 2001. ISOCONCENTRATION CONTOURS REFLECT TYPICAL VALUES.

SCALE

800 0 800 FEET

SIMPLOT PLANT AREA
EASTERN MICHAUD FLATS
SUPERFUND SITE
POCATELLO, IDAHO

GROUNDWATER EXTRACTION REMEDIAL DESIGN REPORT

FIGURE 9

UPPER ZONE ARSENIC ISOCONCENTRATION MAPS (1995/2001)

PROJECT: 010121.2	DATE: MAY 2002
REV:	BY: RHF CHECKED: DEP

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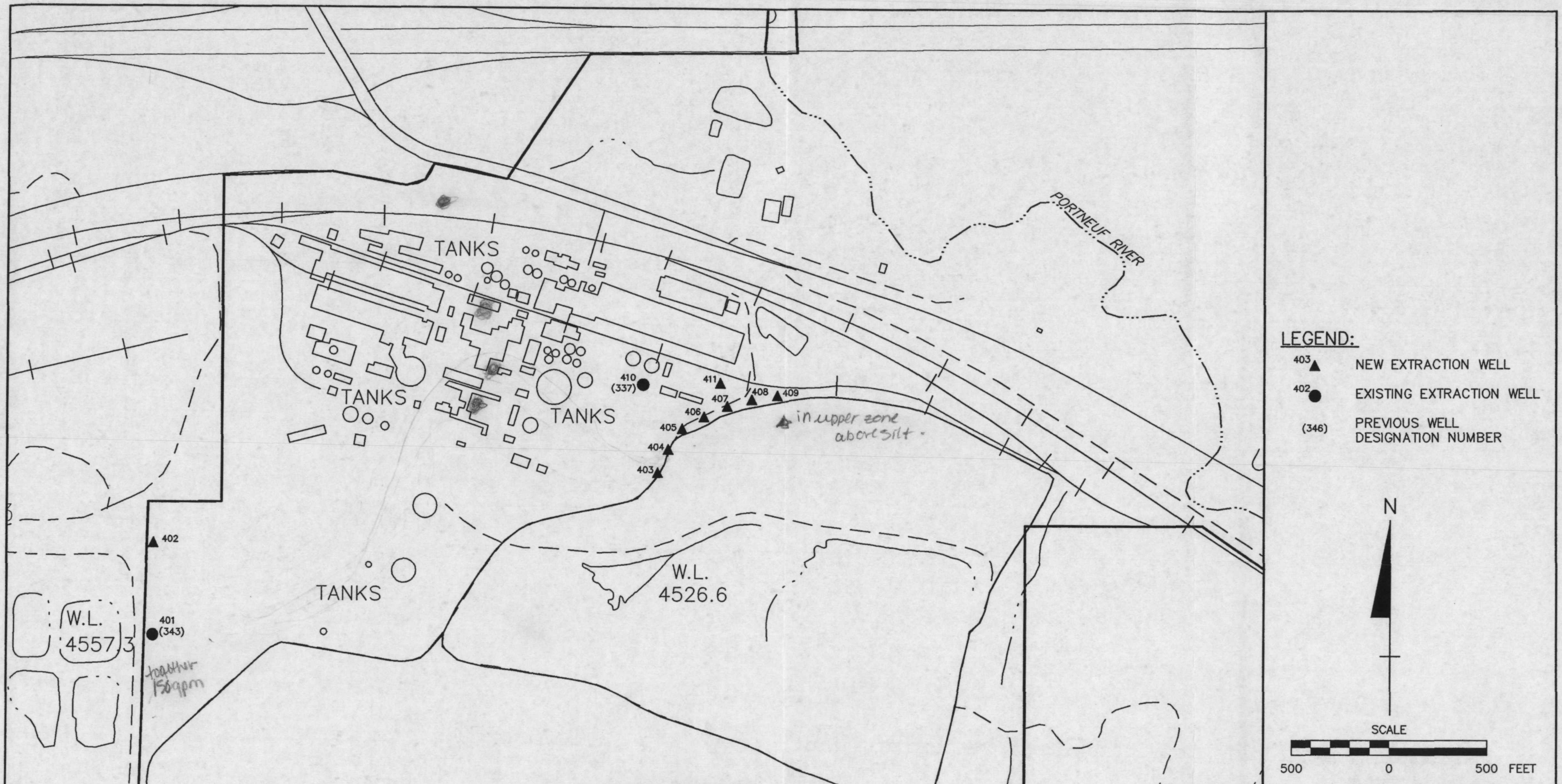

SIMPLOT PLANT AREA
EASTERN MICHAUD FLATS
SUPERFUND SITE
POCATELLO, IDAHO

GROUNDWATER EXTRACTION REMEDIAL DESIGN REPORT

FIGURE 21

EXTRACTION WELL LOCATIONS

PROJECT: 010121.2	DATE: JULY 2002	
REV:	BY: RHF	CHECKED: AC

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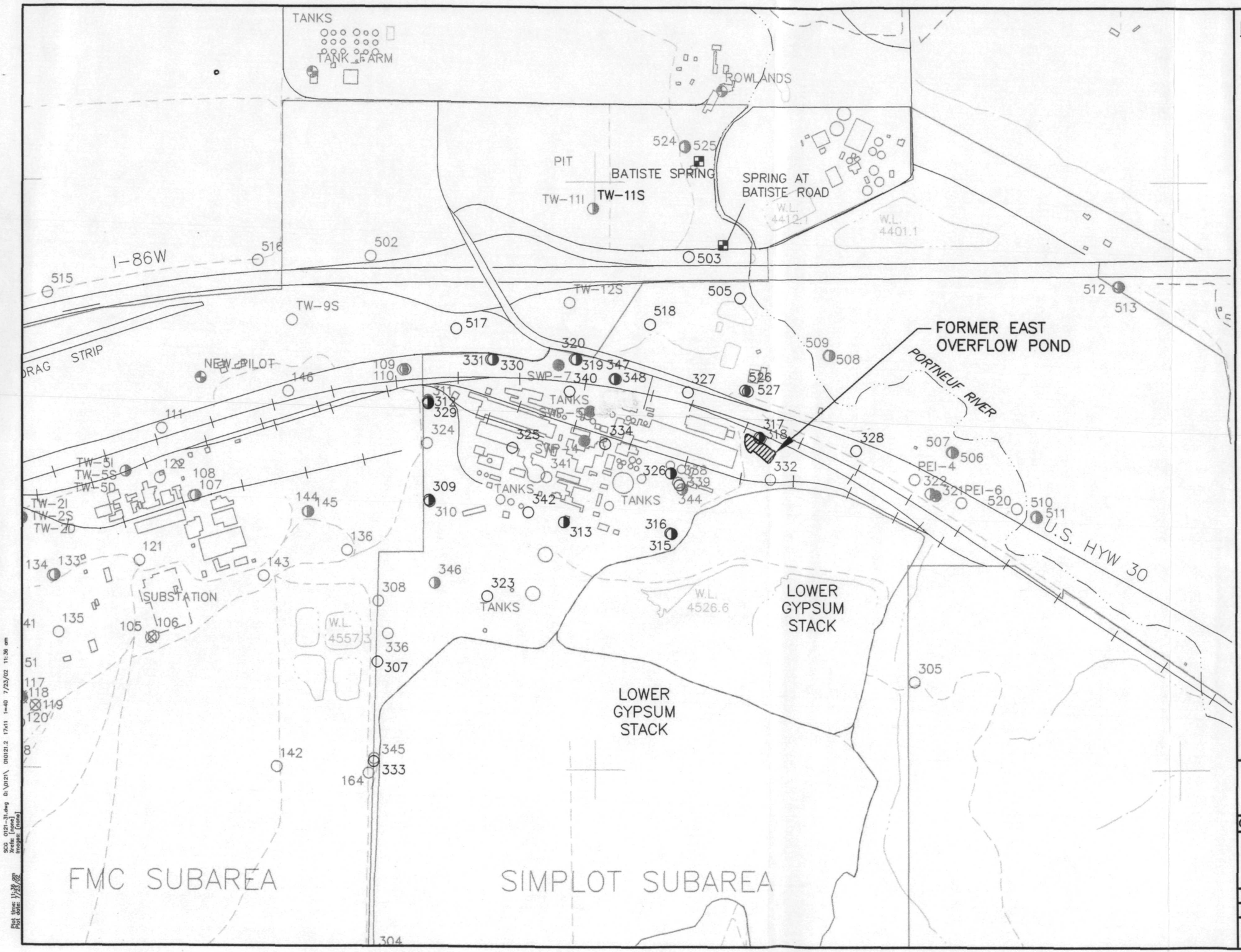

LEGEND:

- SHALLOW MONITORING WELL
- DEEP MONITORING WELL
- REPLACEMENT WATER SUPPLY WELL
- PRODUCTION WELL
- SPRING
- SPRING MONITORING LOCATIONS (POCs)
- PLANT AREA GROUNDWATER MONITORING LOCATIONS
- OTHER POTENTIAL SOURCE MONITORING LOCATIONS
- FORMER EAST OVERFLOW POND MONITORING LOCATIONS
- EXTRACTION WELL

N

SCALE

800 0 800 FEET

SIMPLOT PLANT AREA
EASTERN MICHAUD FLATS SUPERFUND SITE
POCATELLO, IDAHO

GROUNDWATER MONITORING REMEDIAL DESIGN REPORT

FIGURE 8

SIMPLOT PLANT AREA GROUNDWATER MONITORING NETWORK

PROJECT: 010121.2	DATE: JULY 2002
REV:	BY: RHF CHECKED: AC

MFG, Inc.
consulting scientists and engineers

Plot time: 11:38 am
Plot date: 7/23/02
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Xrefs: [none]
Images: [none]

Groundwater Monitoring

As described in the SOW the objective of groundwater monitoring is:

"to collect sufficient data of adequate quality to evaluate the performance of the extraction system and other source control measures in reducing the extent and concentration of arsenic and other contaminants of concern [COCs] *in groundwater in the Plant Area and in preventing migration of arsenic and other COCs into the Area at concentrations above MCLs* [Maximum Contaminant Levels] *or RBCs* [Risk-Based Concentrations]. *Where there is an MCL, the MCL shall control. Specifically, components of the monitoring program will provide data to document the effectiveness of the extraction system in capturing seepage from the gypsum stack, to track water quality in areas potentially affected by sources other than gypsum stack seepage, and to confirm the attainment of performance standards and the long-term effectiveness of the remedy."*

The performance standards for groundwater monitoring set out in the SOW are as follows:

- *Groundwater samples will be collected from wells on a quarterly basis for a period of five years and the samples analyzed for arsenic and other site related constituents. The specific wells to be monitored, the analytes, and the data evaluation procedures will be provided in the draft Groundwater Monitoring RDR.*

- *After the five-year period, the monitoring locations and frequency will be evaluated and monitoring will continue on at least a semiannual basis.*

- *Monitoring of Batiste Spring and other locations in the Area will be initiated on a quarterly basis at the time of system startup. After successful demonstration of compliance with the performance standard* [for the extraction system], *as described in Section III.D.4.b, samples will be collected semi-annually. The data evaluation procedures will be provided in the draft Groundwater Monitoring RDR.*

Proposed Groundwater Monitoring Program

The proposed groundwater monitoring program contains 4 distinct components:

- Monitoring at Off-Plant Area locations (Batiste Spring and the Spring at Batiste Road) to demonstrate performance of the Simplot Plant Area groundwater remedy by comparison of arsenic concentrations with the MCL.

monitoring point.

- Demonstrate the performance of the completed remediation at the Former East Overflow Pond through monitoring of groundwater quality at up gradient and down gradient locations at the East Overflow Pond;

- Monitoring within the Simplot Plant Area to describe and track improvements in groundwater quality, which result from extraction system operation, as required by the SOW; and

- Additional voluntary monitoring to identify areas which may potentially be affected by sources other than gypsum stack seepage (i.e. in the Don Plant and non-Simplot sources in the joint fence line area). This monitoring is not required by the SOW, but expected to provide useful information in evaluating the overall performance of the groundwater remedy).

TABLE 2
Monitoring Parameters

Parameter	Analytical Method[1]	Practical Quantitation Limit (PQL)
Field Measurements		
pH	pH meter/electrometric	±0.1 pH unit
Specific Conductance	Conductivity meter	5 µmho/cm
Dissolved Oxygen	D.O. meter	0.1 mg/L
Turbidity	Nephelometer	0.1 NTU
Temperature	Thermometer	±0.1°C
Laboratory Analyses		
Total dissolved solids	EPA 160.1	10 mg/L
Total alkalinity	EPA 310.1	10 mg/L
Sulfate	EPA 375.2	2.5 mg/L
Orthophosphate	EPA 365.1	0.1 mg/L
Chloride	EPA 325.1	2.5 mg/L
Calcium	EPA 200.7	0.5 mg/L
Magnesium	EPA 200.7	0.5 mg/L
Potassium	EPA 200.7	1.0 mg/L
Sodium	EPA 200.7	1.0 mg/L
Hardness	Standard Method 314A (calculation)	5 mg/L
Arsenic	EPA 200.8 or 206.3	0.005 mg/L
Selenium	EPA 200.8 or 270.3	0.002 mg/L

[1] Method numbers refer to EPA Methods for Chemical Analysis of Water and Wastes (EPA, 1983).

Table 3
Summary of Groundwater Monitoring Locations and Sampling Frequency

Monitoring Objective	Requirement	Sampling Frequency	Monitoring Locations
Demonstrate Performance of Simplot Groundwater Remedy	Performance Standard	Extraction System Startup Phase and Year After: Quarterly Subsequently: Monthly After compliance with performance standard is met: Semi-annually	Batiste Spring (POC) Spring at Batiste Road (POC)
Demonstrate Performance of Former East Overflow Pond Closure and Replacement	Performance Standard	Quarterly	332 318
Track Groundwater Quality Improvements Down Gradient of Extraction System	SOW	Quarterly/ Semi-annually[1]	310 312 319 320 330 331 339 347 348 526 527
Identify Other Potential Sources of Constituents to Groundwater	---	Semi-annually/Annually[1]	307 309 313 315 316 317 323 325 326 327 328 329 332 333 334 340 342 503 505 517 518

Notes: 1 The sampling frequency may be reduced based on the findings of the five-year data review.